

REMARKS

It is respectfully submitted that the present invention is clearly patentably distinguished from the cited prior art.

*Claims 1, 7, 13, 16*

The present invention as defined in claim 1 is concerned with a method for generating code for processing a database. The database is defined in an entity-relationship data model. The method includes creating a source file containing instructions for processing the database, the instructions including one or more high-level directives. The method then pre-processes the source file, by replacing the directives with code, using information pulled from the database data model, to generate a destination file containing the code for processing the database.

In other words, the method as defined in claim 1 starts with a source file containing a number of high-level directives, and pre-processes this source file to create a destination file. The destination file contains the code that will be used to process the database. The pre-processing of the source file involves pulling information from the database data model. For example, in the embodiment of the invention as described on page 6, lines 3 - 12, the pre-processing of an **#aggregate\_table** directive involves pulling information from the data models 10 about the structure of the source and destination tables. As mentioned on page 2, lines 3 - 9, this approach, of pulling data from the database data model, is particularly advantageous, since it gives the software developer control over the way the code is generated. Also, it does not restrict the developer to using a particular data modelling tool to create the data model.

The examiner has rejected claim 1 as allegedly anticipated by the Microsoft Access 97 software, as described by Novalis. In particular, the examiner refers to the use of macros in Access.

A macro in Access 97 allows a user to specify a series of actions to be performed in a particular database. For example, these actions may include:

- open a specified table or query
- find the first record that meets specified criteria
- run a specified Visual Basic function
- run a specified Access menu command
- save a specified table or query.

However, it is respectfully submitted that Access 97 clearly does not pre-process a source file containing macros to generate a destination file containing the code for processing the database. There is certainly no suggestion of in the Novalis reference performing any such pre-processing.

Moreover, it is respectfully submitted that, even if Access 97 does pre-process a source file containing macros to generate a destination file (which is not admitted), there is no suggestion of performing such processing using information pulled from the database data model.

Thus, it is submitted that claim 1 is clearly patentably distinguished from the cited Novalis reference. Similar arguments apply equally to claims 7, 13 and 16.

*Claims 2, 8*

Regarding claim 2, it is respectfully pointed out that there is no suggestion in the cited references of substituting anything for a

macro in Access 97. On the contrary, it is clear that in Access 97 a macro is just a sequence of instructions that is carried out as a unit, and there is no suggestion of substituting anything for the macro. Thus, it is submitted that claim 2 is clearly patentably distinguished from the cited Novalis reference. A similar argument applies equally to claim 8.

*Claims 3 - 6, 9 - 12, 14 and 15*

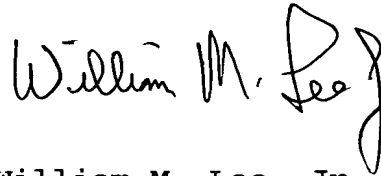
These claims have now been cancelled and so the objections against them need not be considered.

*Conclusion*

In summary, it is respectfully submitted that this application is clearly in order for allowance and such action is respectfully solicited.

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Respectfully Submitted

A handwritten signature in black ink, appearing to read "William M. Lee, Jr.", with a stylized flourish at the end.

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